

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO  
SELL PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND  
ENCUMBRANCES**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,  
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances, and in support thereof would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The assets proposed to be sold are personal property described as thirteen (13) Shale Bins. The Debtor believes that the Shale Bins are worth approximately \$3,000.00 each. Attached hereto as Exhibit "A" is a list of the Shale Bins which are proposed to be sold herein.

3. The Debtor has negotiated the sale of two (2) Shale Bins set forth on Exhibit "A" to International Sales, Inc. (whom is not related to the Debtor) for a lump sum cash payment in the amount of \$6,000.00 (\$3,000.00 each). The Debtor is continuing to negotiate with International Sales, Inc. for the sale of the additional eleven (11) Shale Bins, along with other parties. If this is unsuccessful, the Debtor believes it can sell the additional eleven (11) Shale Bins to unrelated third parties for the minimum sales price in the amount of \$3,000 each.

4. The Debtor believes that the proposed sale of the Shale Bins generates a reasonable value based upon the asset proposed to be sold and its marketability. However, the Debtor believes that some of the Shale Bins condition may require expensive repairs which will limit the value of the bins. The Debtor is requesting the ability to sale the additional eleven (11) Shale Bins for less than the minimum \$3,000.00 price if necessary to consummate a sale.

5. The proceeds from the sale will be paid to WTF Rentals, LLC, which holds claims secured by the thirteen (13) Shale Bins.

6. The Debtor is requesting that the sale of the thirteen (13) Shale Bins set forth on Exhibit "A" attached hereto to International Sales, Inc. and/or any other unrelated third party be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

7. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code the personal property set forth on Exhibit "A" attached hereto to International Sales, Inc. and/or any other unrelated third party pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: January 19, 2018.

Respectfully submitted,



WILLIAM R. DAVIS, JR.  
State Bar No. 05565300  
LANGLEY & BANACK, INC.  
745 E. Mulberry, Suite 900  
San Antonio, TX 78212  
(210) 736-6600

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2018, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.



WILLIAM R. DAVIS, JR.

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c/o Mr. Lynn Frazier  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405

U.S. Trustee  
P.O. Box 1539  
San Antonio, TX 78295-1539

Eddy County Treasurer  
101 W. Greene, Suite 117  
Carlsbad, NM 88220

First National Bank of Beeville  
1400 E. Houston St.  
Beeville, TX 78102

Midland Central Appraisal District  
P.O. Box 908002  
Midland, TX 79708

Midland County  
c/o Laura J. Monroe  
P.O. Box 817  
Lubbock, TX 79408

Nueces County  
P.O. Box 2810  
Corpus Christi, TX 78403

Darin Merle Harding  
P.O. Box 743  
Grande Prairie Alberta T8V3R5

Sentrimax Centrifuges, Inc.  
108 Sentry Drive  
Mansfield, TX 76063

Gary Sweetman  
226 Augusta Drive  
Portland, TX 78374

Magnum Oil Tools Int'l, Ltd.  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405

Crain, Caton & James  
17<sup>th</sup> Fl., 1401 McKinney St.  
Houston, TX 77010-4035

Stang Automation, Inc.  
100 Pointe Marcelle Beaumont  
Alberta T4X 0G2 Canada

Ber Mar Rewind, Ltd.  
9609 109 Street  
Grand Prairie AB T8V 4E3 Canada

Kirby-Smith Machinery, Inc.  
P.O. Box 270360  
Oklahoma City, OK 73137

Williams Scotsman, Inc.  
P.O. Box 91975  
Chicago, IL 60693-1975

Tucker Albin & Assoc., Inc.  
1702 N. Collins Blvd., Suite 100  
Richardson, TX 75080

Harvey Fuels, Inc.  
P.O. Box 8026  
Ruidoso, NM 88355

Forrest Tire, Inc.  
P.O. Box 1778  
Carlsbad, NM 88221-1778

A.G. Investments, Ltd.  
740 Walt Whitman Rd.  
Melville, NY 11747-9090

Pactec, Inc.  
P.O. Box 8069  
Clinton, LA 70722

ASK Environmental Equipment  
20504 Enfield Ave. N  
Forest Lake, MN 55025

Harvey Rodriguez  
215 E. Elm St.  
Loving, NM 88256

United Healthcare  
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Palatine, IL 60055-0151

DNOW, LP  
P.O. Box 40985  
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